

STATE OF SOUTH CAROLINA

(Caption of Case)

APPLICATION OF MBM MOVING SYSTEMS,
LLC FOR A CLASS E CERTIFICATE OF PUBLIC
CONVENIENCE AND NECESSITY

BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA

COVER SHEET

DOCKET

NUMBER: 2009 - 149 - T

(Please type or print)

Submitted by: John J. Pringle, Jr

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NOTE: The cover sheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for use by the Public Service Commission of South Carolina for the purpose of docketing and must be filled out completely.

DOCKETING INFORMATION (Check all that apply)

☐ Emergency Relief demanded in petition ☒ Request for item to be placed on Commission's Agenda expeditiously

☐ Other: _____

INDUSTRY (Check one)	NATURE OF ACTION (Check all that apply)			
<input type="checkbox"/> Electric	<input type="checkbox"/> Affidavit	<input type="checkbox"/> Letter	<input checked="" type="checkbox"/> Request	
<input type="checkbox"/> Electric/Gas	<input type="checkbox"/> Agreement	<input type="checkbox"/> Memorandum	<input type="checkbox"/> Request for Certificatio	
<input type="checkbox"/> Electric/Telecommunications	<input type="checkbox"/> Answer	<input type="checkbox"/> Motion	<input type="checkbox"/> Request for Investigation	
<input type="checkbox"/> Electric/Water	<input type="checkbox"/> Appellate Review	<input type="checkbox"/> Objection	<input type="checkbox"/> Resale Agreement	
<input type="checkbox"/> Electric/Water/Telecom.	<input type="checkbox"/> Application	<input type="checkbox"/> Petition	<input type="checkbox"/> Resale Amendment	
<input type="checkbox"/> Electric/Water/Sewer	<input type="checkbox"/> Brief	<input type="checkbox"/> Petition for Reconsideration	<input type="checkbox"/> Reservation Letter	
<input type="checkbox"/> Gas	<input type="checkbox"/> Certificate	<input type="checkbox"/> Petition for Rulemaking	<input type="checkbox"/> Response	
<input type="checkbox"/> Railroad	<input type="checkbox"/> Comments	<input type="checkbox"/> Petition for Rule to Show Cause	<input type="checkbox"/> Response to Discovery	
<input type="checkbox"/> Sewer	<input type="checkbox"/> Complaint	<input type="checkbox"/> Petition to Intervene	<input type="checkbox"/> Return to Petition	
<input type="checkbox"/> Telecommunications	<input type="checkbox"/> Consent Order	<input type="checkbox"/> Petition to Intervene Out of Time	<input type="checkbox"/> Stipulation	
<input checked="" type="checkbox"/> Transportation	<input type="checkbox"/> Discovery	<input type="checkbox"/> Prefiled Testimony	<input type="checkbox"/> Subpoena	
<input type="checkbox"/> Water	<input type="checkbox"/> Exhibit	<input type="checkbox"/> Promotion	<input type="checkbox"/> Tariff	
<input type="checkbox"/> Water/Sewer	<input type="checkbox"/> Expedited Consideration	<input type="checkbox"/> Proposed Order	<input type="checkbox"/> Other:	
<input type="checkbox"/> Administrative Matter	<input type="checkbox"/> Interconnection Agreement	<input type="checkbox"/> Protest		
<input type="checkbox"/> Other:	<input type="checkbox"/> Interconnection Amendment	<input type="checkbox"/> Publisher's Affidavit		
	<input type="checkbox"/> Late-Filed Exhibit	<input type="checkbox"/> Report		

ELLIS:LAWHORNE

John J. Pringle, Jr.
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July 17, 2009

FILED ELECTRONICALLY

The Honorable Charles L.A. Terreni
Chief Clerk
South Carolina Public Service Commission
PO Drawer 11649
Columbia SC 29211

RE: Application of MBM Moving Systems, LLC for a Class E
Certificate of Public Convenience and Necessity, **Docket No.**
2009-149-T, Our File No. 1894-11636

Dear Mr. Terreni:

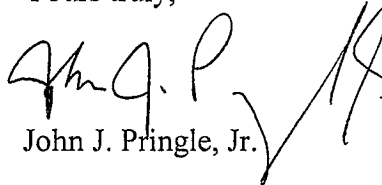
On behalf of MBM Moving Systems, LLC, ("MBM") or ("Applicant"), and pursuant to Commission Rule 103-852, I request that the Commission grant MBM leave to take the deposition of one or more witnesses chosen by the Applicant at a time and place to be agreed upon by the parties in the above-referenced Docket. This witness (or these witnesses) will testify as MBM's shipper witness(es), and do so via deposition and in lieu of an appearance at the hearing in this case. Allowing this witness (or these witnesses) to testify via deposition will accommodate his or her (or their) very busy schedules. I have spoken to counsel for the South Carolina Office of Regulatory Staff ("ORS") regarding this request, and the ORS does not object.

The facts that MBM seeks to establish by this deposition are those that support MBM's application in this Docket: that there is statewide demand for household goods moving services that is not current being met.

The deposition(s) will take place at a time mutually agreed upon by the parties, via telephone or otherwise, at the offices of Ellis, Lawhorne & Sims, P.A., 1501 Main Street, 5th Floor, Columbia, South Carolina 29201.

With kind regards, I am

Yours truly,


John J. Pringle, Jr.

cc: Shealy Boland Reibold, Esquire
Mr. Danny Mitchell